



Gregory Keenan <gwkeenan24@gmail.com>

Leavitt v. Central Credit--One Week Extension request

6 messages

Greg Keenan <gwkeenan24@gmail.com>

Mon, Jun 17, 2024 at 4:48 PM

To: esperling@glaserweil.com, amiller@glaserweil.com, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, swoodnik@grsm.com

Counsel:

Plaintiff intends to seek a one week extension of time to respond to the motion to dismiss and to file an amended complaint. The basis for the extension is that one of our attorneys has been feeling under the weather and the other has been dealing with a personal matter. Could you please provide your position regarding this extension request?

Thank you,
Greg

Gregory Keenan
Attorney
Digital Justice Foundation
516.633.2633

postmaster@grsm.com <postmaster@grsm.com>
To: gwkeenan24@gmail.com

Mon, Jun 17, 2024 at 4:48 PM

Delivery has failed to these recipients or groups:

swoodnik@grsm.com

The email address you entered couldn't be found. Please check the recipient's email address and try to resend the message. If the problem continues, please contact your email admin.

Diagnostic information for administrators:

Generating server: DREXCH07.gordonrees.com

swoodnik@grsm.com

Remote Server returned '550 5.1.10 RESOLVER.ADR.RecipientNotFound; Recipient not found by SMTP address lookup'

Original message headers:

Received: from DREXCH03.gordonrees.com (10.80.100.123) by

DREXCH07.gordonrees.com (10.80.100.127) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.1.2507.39; Mon, 17 Jun 2024 18:48:35 -0500
Received: from fwppagent01.gordonrees.com (10.85.102.112) by DREXCH03.gordonrees.com (10.80.100.123) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.1.2507.39 via Frontend Transport; Mon, 17 Jun 2024 18:48:34 -0500
Received: from pps.filterd (FWPPAGENT01.GORDONREES.COM [127.0.0.1]) by FWPPAGENT01.GORDONREES.COM (8.17.1.19/8.17.1.19) with ESMTP id 45HJaJJK025858 for <swoodnik@grsm.com>; Mon, 17 Jun 2024 16:48:34 -0700
Authentication-Results: GORDONREES.COM;
spf=pass smtp.mailfrom=gwkeenan24@gmail.com;
dkim=pass header.s=20230601 header.d=gmail.com;
dmarc=pass header.from=gmail.com
Received: from fwironport01.gordonrees.com (FWIRONPORT01.gordonrees.com [10.85.102.183]) by FWPPAGENT01.GORDONREES.COM (PPS) with ESMTPS id 3sys8xd3seb-2 (version=TLSv1.2 cipher=ECDHE-RSA-AES256-GCM-SHA384 bits=256 verify=NOT) for <swoodnik@grsm.com>; Mon, 17 Jun 2024 16:48:34 -0700
X-CSE-ConnectionGUID: UWLqfPdrSMKfp5zDhZfqHA==
X-CSE-MsgGUID: 0703D5C1RX0BM0IdopE4Qg==
Authentication-Results: fwironport01.gordonrees.com; dkim=pass (signature verified) header.i=@gmail.com
IronPort-SDR: 6670cb50_u6cULI0Zgcwgj/NRPG1PZnDKLhJ0bMjrw31rC0CSkL9pcHQ
OmI830jdl3qya8s0Xzf0siWks070QjwgByC4YNw==
X-ThreatScanner-Verdict: Negative
X-IPAS-Result: =?us-ascii?q?A0DJBQAWynBmf7SAVdFXAx4BPAwCCzqDboFVQ0iEVYEjj?= =?us-ascii?q?iWCi0tHMAKHT4N1hHyBV4F9DwEBAQEBAQlEBAEBPgEPhDiIdwImSwECA?= =?us-ascii?q?QECAQEBAQMCAwEBAQEBAQEBBqEBAQQBAQECAGQEGBAEBEwEBIhkHDg4phXQNg?= =?us-ascii?q?mcBg2giER0BGx4DEggBBzcCIwERAQUBIgE0gl6CMAEDMQMFoXqBBUKL04EVB?= =?us-ascii?q?QIWgQGCDQbaWgoZKA1sA4FgAgcUhh0lW4JLAYFVAgKEI4NGgSGCKIFKgkSBW?= =?us-ascii?q?hoBg14mgxScAQSZPRuCFYl9JguMXYYBwczAwcHBwQFBwvGBQMCAkIJBwEPE?= =?us-ascii?q?gMEAwQEAQILCQoJAwMCDgIIAwIIBg4TAT8SBBMCCAkeCwMEAgUKAwgCAgC CD?= =?us-ascii?q?gEFAgEBAgICAyCwYCEgQCAQIDAIIAgcBAQIKBwMBAQIGBAMGAgIFBA0DC?= =?us-ascii?q?wEBAgIEA0oCCQ8FAgIDAqMBAQECCgMJAQUCAgEDAqIEBACBbMFAwMEBAMCA?= =?us-ascii?q?wMCDAEFAQUBBQEFBAIGARMCCwCAgFBgMDgMLBAQBqAgIHBgwJBAICAgYBA?= =?us-ascii?q?hEDAQIBBwEDAwIKAQQBCwgBBqgIAQQCAwYQAggFBgUCBAEBAgICCAyPAwYHA?= =?us-ascii?q?gMCBqMFBQMDAgICBwQEAqECAgIBEwYEBAlDAgMEAQUEBAMCFwg0AgUHAQkKC?= =?us-ascii?q?QwBqYCBAlEBwMGBAUEAgMCBECwMCawQCAgQDEQIDBAIKAgQEBwIDAQEMB?= =?us-ascii?q?gQECgILAwUBAQIFAwMJBwYCAwMFBAYCBQMDAwIDAqkCAGIBCQEBAQISAgMOA?= =?us-ascii?q?gQCAQIFBqWEEwICAwIGCAICAgcDAwQCAwYLAQIRAgICBQMEAgIUAwCEAgQFA?= =?us-ascii?q?gQBBgMDAgQGBqgEAgIFAgEBAggCAQ8KBAIBBAMFAwCJAgUFAwIEAgIFCQEBAg?= =?us-ascii?q?gICAwMDAwMCAGMDAgcDAwMHAwUDBAIDBqUHAwUDAwICAhQBBgIFDQgGCwUFB?= =?us-ascii?q?wIGAgQIBQICAwMDAgYKCMDAwIFAgIDAECBq8GAgIDBQYDAwMDBgYDAwIGA?= =?us-ascii?q?wMCAwIDAqMDAQMCawECAwICAgcAgMCBQFqAgICBAlIgICAgIDAwgdAwEA?= =?us-ascii?q?gIEAQQCBAIEAgYDBAICAQcCAwMCawIHAgIEAgICAqMCBACCAgMDAwICAqEJA?= =?us-ascii?q?gUBAQYCAwMCawUDCQMEBQIDCAEBAgIHBwMDBAMBqAgEFBAICBqUCAwICBAIEB?= =?us-ascii?q?QMCawIGBqIBAwIKBqgMFAwMDAwIDAwIDAwIFAgcAgQEBQQCBQCBMDAwEKA?= =?us-ascii?q?gYDAgIFAgQECAgUDAgQEBwICAgcPAwIHBQIFBQUCCAEBQgICAwIGAqICBqEGA?= =?us-ascii?q?gQBAgINAQECAgIDBAMDBwIEAwIIAgMDAwEDAwkGBQQFBAMJBA8CBAEIwEBB?= =?us-ascii?q?AgCBAMCDAICICIQIFCwQEARIKCAMBAQMBAQICAgICDgMCawICAwoCAwIKAwYEA?= =?us-ascii?q?gIGAQEBBAECAwEBAwIBAgcEDgQFBqgIAQMCQoBhAFAhAJAwCEAhAGCgUDA?= =?us-ascii?q?gMFAQIFFQMIAwIJAgQMAw0DAwIGAwYCBqEGAwLAQEHCAUDAwMCFgECAg8IB?= =?us-ascii?q?AYPBwIDAwMEBQcDEgIGDgMDAgMCAQICAgMFBAUCBwMDCgUCCAMCCAUDBwKEC?= =?us-ascii?q?gIKAgYDAgICAgUMAQEBQIDAqUDBwCICAQFBAMBAQYGDCAcAgMEDwMJAwYLA?= =?us-ascii?q?QUFAQMCAgIOAwUDAgMGBgEJBAEFBAkCBQcGBQIBFBYHbqIKAgcCAgIDAQIIC?= =?us-ascii?q?wgCAwIKBAEOBBkCAGIBAQCACwMHAqMCEwMDBQQGAgICAgIDAqEKCwMCAGMDA?= =?us-ascii?q?wMFBQMDAhkDAwIBCgUCDAUEAwQCAgECHQMBBQIDCgEFCQMGAgIDAqUCAwYEA?= =?us-ascii?q?gQBDgEBAQMGcCwkuAgICCQgDCAMFDQINAqMFAgILQqFAQEEAwEBCgEXLQIEA?= =?us-ascii?q?gYMAQEBAgMDBgICAhUFbwMFAwGAgECFAgGAgEDCgoCAgQCBgIEAwIKAwEIA?= =?us-ascii?q?gICDwMJAqgCDgICAwMMDwQDAwMDCQICAhEJCgICAgwICAgIJAgIDAwYBAgMDB?=

=?us-ascii?q?QMCAQEBC8CBAcBAwYKAwICAgkICgkDAwUDCgIBBqYBAgM0AQECExwQJAwIBA?= =?us-ascii?q?gEBBggBAQIEAQQCCAYCAgICCgMFawIDBRUFBAICGQMCBAUDBQMDBAcBAgYED?= =?us-ascii?q?QkDBQMCBAMDAGQEAgkFCQQDCwYBAQEDBAMBAQgHBwMCAQEDAQECCgYFCA0IA?= =?us-ascii?q?wgDbgkDAQYBAQUaAwMOAgICAwIBCgYIBQIDBq4CBAIAQwDAQMDBQ4EFAMEB?= =?us-ascii?q?QICDwxBAgMDBAUBDQICAgMCAgIFBAECBAIEAQgECQECAgIDAqEBAgIEBgUCA?= =?us-ascii?q?gIDAqCMBwMEAwcBqIDAqLDAIDBqUFawUCHgIDAqIEAwMdAQQBBAECAwICA?= =?us-ascii?q?wIDBAEDAwIBAQEBQEDBwICAgQBAQEEAwMFAgICAwCAQMDAQEGAQMBAg8FB?= =?us-ascii?q?QEAEQUIAwIUAwUTAgUBBwIPBqgBKwEEAgIBAj0CAgMEDQgFAGIHAgQNAgQPB?= =?us-ascii?q?QMDDgcBFQgBBAgEBQEAqUIBQUDCBIAhYKcgEBBAQCBwEEAgINAwccAgwCA?= =?us-ascii?q?gYEAgEDByMGAwYJAwIFBRcCAhICBAMFCQQIBA0eAwECCgICAh0CAgCBAjAEA?= =?us-ascii?q?yAdAgkDw8DCwkJEz0BCwcuBAQMCCABBg4UByshXxCtFRlDN4FcKi+BRQEBo?= =?us-ascii?q?3ufTXAnCQEGL+ZoEIHCwFouYEL4QfjQCZ NJh1IKM4hSERIxKBSg0TgVszG?= =?us-ascii?q?i0BAW2BSU8DGQ+00INjyykmMjsCBwEKAQEDCYkigUYBAQ?=

IronPort-PHdr: A9a23:QS8rGhQQuogRaHNk7VL8BoriQ9pson2bAWYlg6HPa5pwe6iut67vI FbYra00yg0TDMoAsawP0baempjcFJdyK7JiGoFfp1IwK1NouQttCtkLei7TgbWF7rUVRE8B 9lIT1R//nu2YgB/Ecf6YED08DXptWZBUhrw0hBoKevrB4Xck9q41/yo+53Ufg5EmCexbal9I RmoqQjdrMcjbZVjJ6o+1BfErWZDdvhLy29v0V+ckBhw69uq8pV+6SpQofUh98BBUaX+Yas1S KFTASolPW4o+sDlrAHPQwSX6HQTS2kbjBVGDRXd4B71Qpn+vC36tvFg2CaBjs35Uao0WTW54 Kh1ThLjlToK0CQ48GHTjcxwkb5brRe8rBFx34LYfIeYP+dlc6jDYd0VW3Z0XsdJVyxAHY8a ZcPD/EcNupctoXxukcCoQe7CQSgGejhyCJHhmXu0KI10+ovHwLI0hE+Ed0Sg3nbtsn50b0IX 0yp0KXFzzP0Z05W1zfn74jIdwgsr/CWxblufsra1EwhGB3bgVWws4P10S6e2+MCs2mV70pvS /ygi2g9pAF3vDSiydwhiobMho0Py1DE8T91z5oyJd29UUN2Z80vH5RMuS+ALYR2Xt8iTH9yu CY80rALT5G2cicUxZkp2hPSdvyJfoiV7h/hSqudPTd1iX1kdb+7mRu+70atx/H9W8Wo3ltGs jZJn8XDu34D2BL6MiKR/1g9UmiwTaCzx7f5v1ALEwulqfWK4QtzqMumpcQq0jPAyz7lFnwg aSLbEsr4PKo5P7iYrj+pp+TKYt0igbmP6QrgM0/AOA4PhE0XmmV50iwzbPj8VD6Tb1WlPE2n a7zsJfVJcQfuKG1GRNa0oEm6xqnDjem1soXnWufIV5bZB6Ki5LlNL0LfziEPuznVehnC12y /3FIrHtGpDNIWLckLflc7Z98UlcA8rwNBQ6ZNUCa80L+z1WkDrstzUEBA0Phe7w+biEtp91 4ceVXiTDa+eNaPeqVmI6fk3L0mWeIAVoCr9K+Qj5/P2kHM1gUUDcrWx3ZsLdHC4GexrI16XY Hrrhdc0DGEKvgs9T0Hxh12CSyVTZ30oU60g4TE7DZqqAprARoCshbyMxD21E4FLaG5bElyMC m/od4ucVvkUcSyc0sBvniQfVbi5RY8uzRGuuxH+y7pgNuFa4jQWu4rs2os92+qGmAoq+CZwD sKS+26JRp5hHwFRjtW16d65QR0z1aH1aViq/NcHMde/exEuwN8PpnZi6RTDdzoVx2JUc2IT VPuFtypGza0S4kZzNoHYkI7ENKn2FSL9iymGbIK350RBZkxuvbV2XTrKt1Vx3fJ1bUoi1s7W dd0PmCogbN5+wHPBonP1UKDmPDuPYsG0SHK7nbL7meDukheGFp/S6jKwmo0TkfxotXl70fAU qSyCL8qPAxsz8KLNqpNbJvul1oQAL/4J9Pbz2SwmE+/Hw2NgLiLadnEYWIYiQrHBUDMsA0e+ 3+AfVwxGSSsrmTXCmYyPV3qakLot+J5rSXoHqCp0wiWYhg5hPK08RkPiKnZEqtLtlp5kd108 mY8FQ0nxNuTENqJ/Vc/L+1XNMkw5F5X2G6erQF5N4ytI/MH5BZW00w/9wum20B4D4xB1Y4hq 3Z5hBEnc/rCiwsfL2rLlYy1Y+K0ejesrEn2Mv2eygSHj4/HoPhVua1h+B3vtRuvQ0U46HAh2 N5QgB7+rt2CREJAGdrxB1owpQNnrpPXaTVv4o7PznRjP0y1vm300s4kVuU/zRPyetZaPeaaG RXpEsocVca0L+l4h1/7ZrlWJ/1Y9qm/I6bEP7P0k0bjdk4ozj6vkWkV5Y1myUuD+m99RrzS0 o4B0rSE2Vj iNX+0xB/p+oi/k4ARYXYJAEmW6za6IYJAk1dd58yLGD00say5/Ek2sHtCi5E+ QWACktd092odk/BCj61lUUYNqxf6XbykyD/xgm3vAnYiPC/xx0X2urdTCBcnYlRHFJpildMG aqPrYw8elwqEUigTywuAyHf4fELmalLBG+MeWnJejnUFT5cN8n4/vLKK4YHoNs4mgNLV0b/Y HWKS+fQmTge3yX/RVAA1TN8Rgu0i7L7mBZ4lV6UfWxX1V0HduR6wj72+Z/hfd5U0WRYHyhps Ab0XFm2brzLtz3c39+L+qj2UV2gZ7FIVgPg9JHemnKL5TxICCObgc2vodzgIyMU1C6m0PBJR SyWrhnBXaDPjI+0YMNlXgpWJA7Mx01kH4xBubthrat1uzBSzt3dtTJP2U76Fsx2wp71MXQxZ QdX5u6Nx0/cxUxyJH2H/KnLZE94JF1xN63Y28T1j9kzWtKam/q7YfrBtVuHPkghLpS/dAz jExrJlmodZSy6lB8EIL1R28BYoRPFJ0D3Duhz2B646fpbdaala3LJ09+RRUndqaI46MngJ5a DXBV7YzRAV88t1Bc2zc7VrdtsLiatz2UtgU53j221+Ix6AdYNp5xsoyrH8yairt+Hw/z0gji gZymIu3p5WDNzB19bmiUXawVxX7eMIJ/Tf1irxCxp/Q0Ie1EpJnAdgGR93jSvf7WD4RtPGyL w+VC3V8sXaUH7PDABWSoFlrtXPBEP2ndjmXKXAVwM8kRuy1K0lWgQRSVzI/9qM=

IronPort-Data: A9a23:PWvidqztGMDSVVMPOa96t+frwirEfRIJ4+MujC+fZmUNrF6WrkVWm 2EYX2DSPPmKYWD0c9okaYTi90kG78KEm9RqHQ4qC00HyNBp0P7XtnIdU2Y0wG6d5aaFB09h yk9hngsC0huExcwcz/0auCJQV9Ui/3QhtIQL8abZnsuLeNcYH58z0olwqhh2dYAbegRW2ulo cn1r9DUJGir0jt1NnN8w6+YoXuDhtyr0N8jlg4PaAjUGP2zSFPUMpBfP7pcBMuf6ENDgKEb 7ebpF2G1j6B1/sdIovNuqr2dEQMXonTMWCm4paBc/H/6vTqjnVapPcTbJLw28049m6t4kZJ 0F2iHCFYVxB0psgNwgqe0Iw/y1WZcwq8ZedfCn16ZT7I0fuKxMAYN02ZK060BFxFutfWQlZG fIKxD8lUy+nnuy0zKiAb8pInpkxAMnZMpo/kyQ1pd3ZJa50rZhrRqzL4ZpJw251iJkeRbDRY M0WbTcpZxPFC/FNEg1PWdRuwaHx3Cm5Km0AwL6Wj fJfd2z7wxNy3bXr0dyPJvSFQMxUmgCTo WeuE2HRXkxDyBk2rtHnSEobDoxg+mc4YoJJqS06ZLjFqL6zAqB0hDPbe8iaLk0xbhCow3x 1Yv0jExqq8+8k2oZtbnRBj+q3mB1iPwQPJVGuw+rRCSk+/aulbBQGcDSTFFZZots8peqSEW0 kGhouzNHDJXvKeubFGT7uqGgT0ANzE1BDpXDcMbdjct797mqYA1qxvASNd/DaK45uEZ/xmgn

FhmSwBu190uYd436kmtwbzQb9uRSnXhSwc04kDGQTvg4FopPMiqYIun7VWd5vFFRGp4crVjl
Cle8yR9xLlRZX1oqMBraLtXdF10z6jeWAeXY10/EcG82FohZPh7x47jBkP1t00c0ZYzLva
0K7kVo0vc8NYCryM/Up093Z5yEWI7IRYnUhPoomX3SNXFbc1M2TTRfMgTCwzRF2+U3BE
c3LKZ/xZrlNUiX5GhrHr9Cg0FDKtEWymTUSpT2hxWh2vz2WZJmYeZtDbd6VchgtPnsiFyNr
b53bpLwoz0BCrGSneMquY7cwtarUXX8Lis9KS7gMbYclQ4cIzgYteNqY4cl3tNxP8NyLiVp
CrhBCe1CjPX3BX6F01DUVg6AJvHUpN2rHZ9NispVwtEEVB4CWP2xP5HLMtLTqpt7+F50/9/Q
t8MfsjKULwFSS3K935ZJdPxpZBrPkbjzw+fHTuXUB5mdb5ZRivN5oDfEcnr/3IwFSazj5Y1j
ICh8QL5eqA9YTpeIvzYU9+V9Gppj0Mhwlpze2DqPuhsfF7d9dk2Ci7p0d4yDcI+CTTC4Tq40
QypLw8SjrtPqdVt8f3ip60Nn6G2GcRQ2tYGGj66+6tFC/4p2CM/65JYNyqTxv8Clzm2fyFT
vpH6t3BK9s7pUZun6sgNqd014QsysDKpY5K6ihFR1L1N0+KDJFkKv4fhf/jLVHn0JliFHnS
3Cx9cl/EpTXHdHuD3o6BhcvN8aH3tEqwgji1+w/ehjG1XUm7Yi8cBtg0jeXg3ZgN5pzCoQux
Nkht0Mw6wCSjhkLMM6MvhL9lajf2AxbKE6iq40WIPbqBIn6lVnU6zuDiXb5JKuadIVFmIIJ
jSSprTJhpUC507kXkcwK0Pw3rtmtcxTgCxJ8V4MHETWu9zngvRs4gZd3w5qRSStozzJG8d1JB
E5VC2NPK5+zoghY3Pp4Yzj0GiVqJgGoxUjq+l5YyEzbVxaJU0L0Hk0cOMGM3kYTzExEdBMG/
rvCkGfBehTpdfHxwSEddxNEqfvibNop7SzEupmtMPqkFqkAQwj0o/GRd0tRjDD4E+YduVbhm
dB62MpRNYjqKnQ2sYAgLourxZA8aUujGjRZYPd+KgpIzntSAuq02LTf3HrK9J/GfPa1GSZV
el8Ld1rfDaj3n+sqjs70/Y9E4VslqR020tYK6LZhk9Ygb6xtTEzjYnx8BL5j2oVQ91Dt8YxB
4fSVjCaGFyrmnpmtD7RnfZAJ1aHT4EIVC/k0MCx1dc5JZYJneVvUEM1i5+fnXGeN1l59B014
iLHQYLrzNJZ9Ic9pLu0T51/BDi1J+jjC8W00gS460pVYf31bMzhigIyq3vcBTpwA4c/YdpMu
IqojM/Wx2LA5bY/bHDYKcK0Fo5P/sSDY9BU0cPWclhfxCuLZ9Dw7isI60SHGIxuvPpa1JP2W
TnieM+UcPgLUex831xQUTBVSDwG0pT0b4DhhCKz10uNAR4jyj76LMur2HvqTGNDfAkKMI3aJ
i6tnNj2/fFejoBHJCFcNsFcG5UifWPSA/o3ReP+pRyzLze0gGrbnpDAiBB5yzXAKkfcIfbA+
ZifGyTPLkWjiprpuNcnZd55CAMLXBHhuI1QEIR1vh2hx2+D08ENe4tCooHOL4Fjh3N0IzEW
x+VYFsAESndWRF2QSf46vnXSadAbUqEfX9LToL4UiVSnmXAKwtPbfzRpjskxGImbb80KaK
N8goyy6e1D7x5xyXu8c68CqmeotlLuQ2nsM/lu7iMDoRQoXBbIRznF6AQ5RTmr9HtrQkFnQb
30ALYyerJpXlWaqeSqrR5KZ9Nz1ct8iI/XEoBpjG0rihrg=

IronPort-HdrOrdr: A9a23:KbGbUan8NhlPwt rnmDmSoXQ3s+bpDfIE3DAbv31ZSRFFG/Fw9v
re+sjzsCWftN9/YgBDpTntAtjifZq+z/5IC0sqTNKftWd0QPCEGgI1/qH/9SPiVYySdtkY
hnaLZ3E9D9ABxXiszg8BCkH9tI+rW6GW0T6ts2DU0BceinUc9dBs5CazqmLg==

X-Talos-CUID: =?us-ascii?q?9a23=3AxF26amp0TTIaJC/1laR+RWHmUf0aVmTT9HvKGGq?= =?us-ascii?q?bB340WpGVe1GJ2Ioxsg=3D=3D?=

X-Talos-MUID: =?us-ascii?q?9a23=3Axh1rqAz4a7Qp5mEfUq1Y7PXJkt+aqIPxLxshzL4?= =?us-ascii?q?CgfmjHwkoGjuaLBNre4Byfw=3D=3D?=

X-IronPort-Anti-Spam-Filtered: true

X-IronPort-AV: E=Sophos;i="6.08,246,1712646000";
d="scan'208,217";a="45112128"

X-DKIM-MONITORING-Results: PASS

Received: from mail-yw1-f180.google.com ([209.85.128.180])

by fwironport01.gordonrees.com with ESMTP/TLS/ECDHE-RSA-AES128-GCM-SHA256; 17 Jun 2024 16:48:33 -0700

Received: by mail-yw1-f180.google.com with SMTP id 00721157ae682-62cddff7f20so48510647b3.3
for <swoodnik@grsm.com>; Mon, 17 Jun 2024 16:48:32 -0700 (PDT)

DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=gmail.com; s=20230601; t=1718668111; x=1719272911; darn=grsm.com;

h=to:subject:message-id:date:from:mime-version:from:to:cc:subject
:date:message-id:reply-to;

bh=l/svKAJv6MdyfhGbqQMo2qcmIL257h98te3Kep3czi=;

b=bc/aW+GZ3N2HsW1qfWPR3e/r0ScooHPJSJ4NMJDUHR7xMEYsN18UerCn7PLimyJR7V
xCNtlj+iMxi1ERKldnt2S6yk/YRLY0jobjuTa9rLQA6gMboAAu+UPHmg663iyQWK2ib9

nWiYDs0BcQz6F1Xh9JaVLvUtSioZCFmi5oAkxa6jgUWAL3Cf9IjH+VH9XG0vmeWCX9AR

Aa0qEsTc5fTHQ4MX00/QuiybfgfSCZzTHJ2kSoeidmdu1J41IfC/b3YXHrA4GxPBgU8nD

N3PIoRkIsDZ4jxAal6IazefXp5CeE6BhbSGWfTkMX+PEIy1BdtpV+VxU0F4+nzmNwbo9
8XPA==

X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;

d=1e100.net; s=20230601; t=1718668111; x=1719272911;

h=to:subject:message-id:date:from:mime-version:x-gm-message-state
:from:to:cc:subject:date:message-id:reply-to;

bh=l/svKAJv6MdyfhGbqQMo2qcmIL257h98te3Kep3czi=;

b=NXUd2DKAheRusP0wRhs7w8c6XSaEAzESMft2qbKm38km9T/xkoFwnpBgAuyJeg50y
HgSv0yMdlzYrbG10ckmJyrG012yKlyh5Cvqc2cudVfeVgdtiyj0GnVvP1Eci6VaHgWCo

0tbbi5UrxFwK46+/ATCAxvG32xcRw5g09/hLt70fnaI0STFZU4WYjHZ31TdeIYem9lmc
MUe0tFZJ6phd/y+RP3ahlRPGK7Hax5pNG69IbzV64DXFrXo9mbkQn9CsD5AAAnquHtTZC
hRzLZF/alzfYyMQ1Eq07uciz0tPhbF3eQC8AXq4mm2QIczhsJb4ZgIlqsTF0QTc+FHEc
jFGw==
X-Forwarded-Encrypted: i=1; AJvYcCWMi0zrU87gM4hg5qgeHAjqIMT3zzd1GQA04FsjgUPSajaGBBHUpRL8
2vSmwFqtg0YwW3c4euDfcIhqVlcYulIzxw==
X-Gm-Message-State: A0Ju0YxSLFT5579rVPBaRGH7NvJN5r7aXdsBM/HiCE6vAN4sL7zeyfUM
fG/FVzZPCz6NVwKNB+lpmPgUh7LYndDJ3ivG+ypC9ds3ZxK5sdQe5r0Gmx3yF6LhvtkrKcixQX/
HeHdm8px9qVpLAlJ0SD+zxdyLr8D0Q==
X-Google-Smtp-Source: AGHT+IGGVLNyHNzz157XvACN+NCRcBVnCufQgEErWP0ahFx/
RKAb9khrgdPYw7T0iMowiBGA6v2ya0nc7KbHQFxpffM8=
X-Received: by 2002:a81:7144:0:b0:62c:e74d:8152 with SMTP id
00721157ae682-632224543b5mr89455597b3.19.1718668111579; Mon, 17 Jun 2024
16:48:31 -0700 (PDT)
MIME-Version: 1.0
From: Greg Keenan <gwkeenan24@gmail.com>
Date: Mon, 17 Jun 2024 16:48:20 -0700
Message-ID: <CAEd+yUXLFw2cQrj5J-jBZNEupio39bCpJpctWT+SWWhog5-Xw@mail.gmail.com>
Subject: Leavitt v. Central Credit--One Week Extension request
To: <esperling@glaserweil.com>, <amiller@glaserweil.com>, Andrew Grimm
<agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>,
Gregory Keenan <gregory@digitaljusticefoundation.org>, <swoodnik@grsm.com>
Content-Type: multipart/alternative; boundary="0000000000047180c061b1e9a14"
X-Proofpoint-ORIG-GUID: tUpMzLqmvl1TUFnNVctGFaq5a9J-eD0P
X-CLX-Shades: MLX
X-Proofpoint-GUID: tUpMzLqmvl1TUFnNVctGFaq5a9J-eD0P
X-CLX-Response: 1TFkXGBIEEqpMehcZGx0RC1lEF2ZoTlwBX38ZE11IEQpYW BdmWlcZAR57XG5
QRxEKe4XY1Nja3sTWh4aX14RCn1MF2hCbGheSd5ZH17EQpDSBcHGREGQ1kXBxsdHhEKQ0kXGg
QaGhoRC1lNF2dmchEKWUkXGxNxGwYZEncGGxkfBhkaQhIGGgYbGhoGGnEaEBp3BhoGGgYaBhoGG
gYacRoQGncGGhEKWV4XbGx5EQpJRhNRVh0RURYT09ZdVpYRU5fSV5DRUQHxEcRCk1HF3hPTREK
Q04XXn9aZ1BmW0dcRht+f2xEZhxJXm1sS1sfSxNgB09uGnoRC1hcfX8EGgQZHBwFGxoEGxoaBBs
ZhgQZGRAbHhofGhEKXlkXTlpHBV4RCK1cFwgTehEKTf0xaGlna2sRCkxF29ra2traxEKQk8XaE
V7AXxPT39JHUCRckNaFxgaEwQShwQbGBIEGxIaEQpCXhcbEQpEXhccEQpCXBcbEQpeThcbEQpCS
xdjU2NrexNYfhpfxhEKQkkXY1Nja3sTWh4aX14RCkJFF21NzkcSXUcBaRgZEQpCThdjU2NrexNY
fhpfxhEKQkwXZllnGQEEe1xuUEcRCKjsF2gfTnNb2VFEkEfEQpCQBdhc3h+HFITYx4aZhEKQlg
Xbn9jHXAbT0VffkcRCK1eFwcbEQpaWBcZEQp5Qxdr39/GBxbYUNNKhEKWUsXGxofGRwRCnBoF2
ZnZGNZWGMFXWQbEAcZGhEKcGgXY1J7W25QTUL/exoQBxkaEQpwaBdvW2x/Q2NcaFJsbhAHGRoRC
nBoF2dbbFN4eUVJaHthEAcZGhEKcGgXYllsfGJTUE8Sa0EQBxkaEQpwaBdtcmZcBRlNXHl+ThAH
GRoRCnBoF2hfeRlMQB5lUhlyEAcZGhEKcGgXem1ITENwb0VbG20QBxkaEQpwbBdjY215ARx/ZB1
dbxAaEQptfhcHGxEKWE0XSxEg
X-Proofpoint-Banner-Trigger: inbound
X-Proofpoint-Virus-Version: vendor=baseguard
engine=ICAP:2.0.293, Aquarius:18.0.1039, Hydra:6.0.680, FMLib:17.12.28.16
definitions=2024-06-17_14, 2024-06-17_01, 2024-05-17_01
X-Proofpoint-Spam-Details: rule=inbound_notspam policy=inbound score=0 clxscore=284
adultscore=0
priorityscore=317 unknownsenderscore=20 phishscore=0 impostorscore=0
suspectscore=0 spamscore=0 malwarescore=0 mlxscore=0 bulkscore=0
lowpriorityscore=0 mlxlogscore=414 classifier=spam adjust=0 reason=mlx
scancount=1 engine=8.12.0-2405010000 definitions=main-2406170184
domainage_hfrom=10536
Return-Path: gwkeenan24@gmail.com

Final-Recipient: rfc822;swoodnik@grsm.com

Action: failed

Status: 5.1.10

Diagnostic-Code: smtp;550 5.1.10 RESOLVER.ADR.RecipientNotFound; Recipient not found by SMTP address lookup

----- Forwarded message -----

From: Greg Keenan <gwkeenan24@gmail.com>
To: <esperling@glaserweil.com>, <amiller@glaserweil.com>, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, <swoodnik@grsm.com>
Cc:
Bcc:
Date: Mon, 17 Jun 2024 16:48:20 -0700
Subject: Leavitt v. Central Credit--One Week Extension request
Counsel:

Plaintiff intends to seek a one week extension of time to respond to the motion to dismiss and to file an amended complaint. The basis for the extension is that one of our attorneys has been feeling under the weather and the other has been dealing with a personal matter. Could you please provide your position regarding this extension request?

Thank you,
Greg

Gregory Keenan
Attorney
Digital Justice Foundation
516.633.2633

Greg Keenan <gwkeenan24@gmail.com>

Mon, Jun 17, 2024 at 5:53 PM

To: esperling@glaserweil.com, amiller@glaserweil.com, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, swodnik@grsm.com, Andrew Grimm <andrew.b.grimmm@gmail.com>

Counsel:

Following up. I see that Ms. Wodnik's email address was mistyped in the original email (and bounced back), so I am recirculating this email so as to include her in the email.

Could you please provide your position regarding Plaintiff's intent to seek a one-week extension of time to respond to the motion to dismiss and to file an amended complaint in the Leavitt v. Central Credit matter. I am available to confer by phone this evening, as well.

Thank you,
Greg

Gregory Keenan
Attorney
Digital Justice Foundation
516.633.2633

[Quoted text hidden]

Alexander Miller <amiller@glaserweil.com>

Mon, Jun 17, 2024 at 8:12 PM

To: Greg Keenan <gwkeenan24@gmail.com>, Elizabeth Sperling <esperling@glaserweil.com>, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, "swodnik@grsm.com" <swodnik@grsm.com>, Andrew Grimm <andrew.b.grimmm@gmail.com>

Hi Greg,

We will stipulate to an extension that also re-notes the motion to a week later so we have sufficient time for our reply. Please send over a draft stipulation when convenient.

Best,

Alex



Alexander Miller

ASSOCIATE

Glaser Weil Fink Howard Jordan & Shapiro LLP
600 West Broadway, Suite 2150
San Diego, CA 92101
glaserweil.com | [bio](#)

amiller@glaserweil.com

T 619.762.5952



To send files securely, please click [here](#)

This message and any attached documents may contain information from the law firm of Glaser Weil Fink Howard Jordan & Shapiro LLP that is confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

[Quoted text hidden]

This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. Mimecast helps protect large and small organizations from malicious activity, human error and technology failure; and to lead the movement toward building a more resilient world. To find out more, visit our website.

Greg Keenan <gwkeenan24@gmail.com>

Mon, Jun 17, 2024 at 8:50 PM

To: Alexander Miller <amiller@glaserweil.com>

Cc: Elizabeth Sperling <esperling@glaserweil.com>, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, "swodnik@grsm.com" <swodnik@grsm.com>, Andrew Grimm <andrew.b.grimm@gmail.com>

Alex,

Thank you for your professional courtesy regarding the stipulation. I have sent over the draft stipulation, as requested.

Please see attached.

Best,
Greg

Gregory Keenan
Attorney
Digital Justice Foundation
516.633.2633

[Quoted text hidden]

2 attachments

 **LeavittEveriWDWash 2024-06-17 Proposed Order.docx**
56K

 **LeavittEveriWDWash 2024-06-17 Leavitt Ext Req.docx**
59K

Greg Keenan <gwkeenan24@gmail.com>

Mon, Jun 17, 2024 at 11:09 PM

To: Alexander Miller <amiller@glaserweil.com>

Cc: Elizabeth Sperling <esperling@glaserweil.com>, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, "swodnik@grsm.com" <swodnik@grsm.com>, Andrew Grimm <andrew.b.grimme@gmail.com>

Hi Alex,

Looking to put this on file. Can you get back to us in the next twenty minutes or so?

Best,
Greg

[Quoted text hidden]